IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In re:

: Case No.: 16-11889

Duy Quan : Chapter 13

Judge Jean K. FitzSimon

Debtor(s) : **************

:

Wells Fargo Bank, N.A. : Date and Time of Hearing

Movant, : Place of Hearing

wovant, : May 30, 2018 at 9:30 a.m.

:

Duy Quan : U.S. Bankruptcy Court

: 900 Market Street, Courtroom #3

Frederick L. Reigle : Philadelphia, PA, 19107

Respondents.

NOTICE OF MOTION, RESPONSE DEADLINE, AND HEARING DATE

Wells Fargo Bank, N.A. has filed a Certification of No Objection Regarding Motion for Relief from the Automatic Stay with 30 day waiver with the Court to permit Wells Fargo Bank, N.A. to foreclose on 111 West Grange Avenue, Philadelphia, PA 19120 and Abandonment of Property.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney you may wish to consult an attorney.)

- 1. If you do not want the Court to grant the relief sought in the motion or if you want the Court to consider your views on the motion, then on or before May 23, 2018, you or your attorney must do <u>ALL</u> of the following:
 - A. File an answer explaining your position at:

Clerk, U.S. Bankruptcy Court

U.S. Bankruptcy Court 900 Market Street Philadelphia, PA, 19107

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above, and

B. Mail a copy to the Creditor's attorney and the below listed:

United States Trustee Office of the U.S. Trustee 833 Chestnut Street, Suite 500 Philadelphia, PA 19107

Frederick L. Reigle Chapter 13 Trustee 2901 St. Lawrence Ave. Reading, PA 19606 ecfmail@fredreiglech13.com

Manley Deas Kochalski LLC P.O. Box 165028 Columbus, OH 43216-5028

- 2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above, and attend the hearing, the Court may enter an Order granting the relief requested in the Motion.
- 3. A hearing on the Motion is scheduled to be held before the Honorable Jean K. FitzSimon on May 30, 2018 at 9:30 a.m. in U.S. Bankruptcy Court, 900 Market Street, Courtroom #3, Philadelphia, PA, 19107.
- 4. If a copy of the Motion is not enclosed, a copy of the Motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).
- 5. You may contact the Bankruptcy Clerk's office to find out whether the hearing has been canceled because no one filed an answer.

DATE:	5/8/18	

IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In re:

Case No.: 16-11889

Duy Quan : Chapter 13

Judge Jean K. FitzSimon

Debtor(s) : **************

:

Wells Fargo Bank, N.A. : Date and Time of Hearing

Movant, : Place of Hearing

: May 30, 2018 at 9:30 a.m.

:

Duy Quan : U.S. Bankruptcy Court

: 900 Market Street, Courtroom #3

Frederick L. Reigle : Philadelphia, PA, 19107

Respondents.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Certification of No Objection Regarding Motion for Relief from the Automatic Stay with 30 day waiver with the Court to permit Wells Fargo Bank, N.A. to foreclose on 111 West Grange Avenue, Philadelphia, PA 19120 and Abandonment of Property was served on the parties listed below via e-mail notification:

United States Trustee, Office of the U.S. Trustee, 833 Chestnut Street, Suite 500, Philadelphia, PA 19107

Frederick L. Reigle, Chapter 13 Trustee, Chapter 13 Trustee, 2901 St. Lawrence Ave., Reading, PA 19606

Michael A. Cataldo, Attorney for Duy Quan, Cibik & Cataldo, P.C., 1500 Walnut Street, Philadelphia, PA 19102, ecf@ccpclaw.com

Michael A. Cibik, Attorney for Duy Quan, 1500 Walnut Street, Suite 900, Philadelphia, PA 19102, ecf@ccpclaw.com

The below listed parties were served via regular U.S. Mail, postage prepaid, on May <u>8</u>, 2018:

Duy Quan, 142 Sparks Street, Philadelphia, PA 19120

Duy Quan, 111 West Grange Avenue, Philadelphia, PA 19120

City Of Philadelphia, Major Tax Unit/Bankruptcy Dept., 1401 JFK Blvd, Room 580, Philadelphia, PA 19102

City Of Philadelphia, Major Tax Unit/Bankruptcy Dept., 1401 JFK Blvd, Room 580, Philadelphia, PA 19102

City Of Philadelphia, Major Tax Unit/Bankruptcy Dept., 1401 JFK Blvd, Room 580, Philadelphia, PA 19102

City Of Philadelphia, Major Tax Unit/Bankruptcy Dept., 1401 JFK Blvd, Room 580, Philadelphia, PA 19102

Selene Finance, PO Box 71243, Philadelphia, PA 19176

DATE:	5/8/18

/s/ Karina Velter

Karina Velter, Esquire (94781) Kimberly A. Bonner (89705) Adam B. Hall (323867) Sarah E. Barngrover (323972) Manley Deas Kochalski LLC P.O. Box 165028 Columbus, OH 43216-5028 Telephone: 614-220-5611

Fax: 614-627-8181 Attorneys for Creditor

The case attorney for this file is Karina

Velter.

Contact email is kvelter@manleydeas.com